

U.S. ENVIRONMENTAL PROTECTION AGENCY  
 POLLUTION/SITUATION REPORT  
R207 LLC Drum Site - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region III

**Subject:** POLREP #7  
POLREP #7 AND FINAL  
R207 LLC Drum Site

Rutherford Glen, VA  
Latitude: 37.9296234 Longitude: -77.4539489

**To:** Ed Bonham, Caroline County Fire & Rescue  
Regional Response RRC, EPA  
Dell Cheatham, VDEQ

**From:** Christine Wagner, OSC  
**Date:** 6/27/2014

**Reporting Period:** Closeout Documentation

## 1. Introduction

### 1.1 Background

Site Number:	A3UMRV00	Contract Number:	EP-S3-12-03
D.O. Number:	3	Action Memo Date:	8/17/2012
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	1/7/2013	Start Date:	
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	VDEQ, VDEM
FPN#:		Reimbursable Account #:	

#### 1.1.1 Incident Category

Removal Action

#### 1.1.2 Site Description

Unsecured trailer of drums of unknown content

##### 1.1.2.1 Location

Chesterfield Road  
Rutherford Glen, Caroline County, VA

##### 1.1.2.2 Description of Threat

Drums of unknown contents were stored in an unsecured trailer on the Site. Some of the drums contain volatile and flammable materials.

##### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

A preliminary removal assessment, assisted by VDEM, indicated the drums on the trailer are unsecured and likely contain flammable and/or toxic hazardous substances. The drums were subsequently sampled and the contents indicated the presence of hazardous substances, pollutants, or contaminants

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

A trailer containing 55-gallon drums was abandoned on the property by an acquaintance of the leasee of the property. Efforts by VDEQ and EPA to encourage the drum owner to secure or remove the drums have been unsuccessful.

EPA began a removal action at the Site on January 7, 2013 and demobilized from the Site on 9/14/13.

## **2.1.2 Response Actions to Date**

In January 2013, START sampled the drums with the property owner's permission.. Drums with similar contents were not all individually sampled. A total of 58 drums were sampled and overpacked.

Sets of analysis to be performed were determined by physical appearance and air monitoring results. Not all drums were sampled for the same analytes. Hazardous substances including metals, volatile organic contaminants, and semi-volatile organic contaminants were detected. Furthermore, the contents of several of the drums were flammable. None of the drums contained herbicides or pesticides.

The owner of the drums agreed to arrange for proper transportation and disposal of the drums. On or about 10/11/13, the drums were removed from the Site and disposed. Manifests are posted in the documents section of the website.

A summary of the analytical is also posted on the website. Do not use the contaminants data on this website as a summary of the analysis. This portion of the website does not allow for accurate data entry. A summary of the types of contamination is as follows

### **Metals**

7 drums contained arsenic  
5 drums contained barium  
2 drums contained cadmium  
19 drums contained chromium  
19 drums contained lead

The 19 drums which contained chromium and lead were likely very old paint which was produced and used prior to the hazardous waste regulations. Some of these drums had "highway paint" markings<sup>6 d</sup>

### **Volatile Organic Contaminants**

4 drums contained acetone  
6 drums contained benzene  
5 drums contained 1,1,2 trichloroethane  
1 drum contained methylene chloride  
10 drums contained cyclohexane  
14 drums contained ethylbenzene  
16 drums contained xylene  
5 drums contained 2-butanone  
2 drums contained methyl isobutyl ketone  
15 drums contained toluene  
10 drums contained isopropylbenzene  
1 drum contained tetrachloroethane  
2 drums contained 1,2 dichloroethane  
11 drums contained methylcyclohexane  
1 drum contained MTBE

### **Semi-Volatile Organic Contaminants**

4 drums contained 1,1 biphenyl  
10 drums contained 2-methylnaphthalene  
4 drums contained acetophenone  
2 drums contained dibenzofuran  
4 drums contained fluoranthene  
1 drum contained fluorene  
10 drums contained naphthalene  
6 drums contained phenanthrene  
5 drums contained pyrene  
1 drum contained dimethylphthalate

None of the drums contained pesticides or herbicides

## **2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

EPA has identified a potentially responsible party. Because the PRP is an individual, his/her name is being maintained in a separate EPA file. This individual acknowledged to EPA and VDEQ that he made arrangements with the tenant to store the drums on this property. The OSC worked with EPA's Criminal Investigative Division.

Despite repeated efforts to reach the potentially responsible party, EPA was unable to successfully enter into an Administrative Order with this individual.

The owner of the property agreed to dispose of the drums. To EPA's knowledge and based on information in the Site file, the owner of the property was not the party who disposed of the drums on Site, nor did this owner make arrangements to have the drums stored on this property. The OSC recommends that the owner of the drums be pursued for cost recovery.

The drums containing old paint were likely used for highway markings prior to the initiation of the hazardous waste regulations. This is based on some of the drums labelled "Department of Highways". Refer to Polrep #6 for more information.

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

The removal action is complete. No further actions are planned. The OSC recommends the Site be removed from consideration for remedial action because the removal action successfully removed the threat of release of hazardous substances from the Site.

#### 2.2.1.2 Next Steps

No further actions are anticipated. The OSC visited the Site to ensure the property is secure to prevent any further disposal of wastes.

The Site will be referred to EPA Region III Cost Recovery Section.

#### 2.2.2 Issues

Three potentially responsible parties were identified; however, only one of those parties cooperated with EPA.

The contaminants data on the website does not allow for accurate accounting of materials contained and disposed of on Site. For example, the data entry does not allow for RCRA Hazardous Wastes and does not contain chemical synonyms. For a more accurate accounting of the materials on Site, please see the manifests and analytical data sheets posted in the DOCUMENTS Section

No further EPA action is anticipated.

## 2.3 Logistics Section

Logistics are complete. All EPA contractor equipment and rental equipment has been removed.

## 2.4 Finance Section

### 2.4.1 Narrative

EPA has authorized a total budget of \$527, 533 for the removal action.

\* The OSC increased the START ceiling to \$50,000 using unallocated funds from the extramural budget contingency of \$68808 to create a current contingency fund of \$41158

\*\* The OSC has not yet received any laboratory cost estimates

### Cost-Savings Measures

EPA has implemented several cost-savings measures to reduce costs at the Site. These include, but are not limited to:

- Using local personnel to the extent practicable to eliminate travel expenses (2/3 of personnel on Site are local)
- Operating out of Site vehicles rather than mobilizing a Command Post to Site
- Using rented fencing
- Accepting offer from Caroline Fire & Rescue for air bottle refills at no charge
- Arranging for local non-haz trash disposal, eliminating the need for a rolloff on Site
- Utilizing EPA laboratories when possible to minimize contract laboratory costs.
- OSC driving samples to EPA lab instead of incurring contractor costs
- Working with the property owner to have him remove and dispose of the drums properly, enabling considerable cost savings

### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$285,000.00	\$23,983.00	\$261,017.00	91.58%
START	\$50,000.00	\$42,472.00	\$7,528.00	15.06%
Lab Costs	\$60,000.00	\$0.00	\$60,000.00	100.00%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	<b>\$395,000.00</b>	<b>\$66,455.00</b>	<b>\$328,545.00</b>	<b>83.18%</b>

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

## **2.5 Other Command Staff**

No information available at this time.

## **3. Participating Entities**

### **3.1 Unified Command**

Caroline County Fire & Rescue  
Virginia Department of Environmental Quality  
Virginia Department of Emergency Management  
EPA

The OSC would like to recognize Mr. Ed Bonham from Caroline County Emergency Services and the Caroline County Sheriff's Department for their continued assistance throughout this project.

## **4. Personnel On Site**

No information available at this time.

## **5. Definition of Terms**

FTIR - Fourier Transform Infrared Spectroscopy  
PRP - Potentially Responsible Party  
START - Superfund Technical Assistance Response Team  
VDEQ - Virginia Department of Environmental Quality  
VOCs - Volatile Organic Compounds  
VDOT - Commonwealth of Virginia Department of Transportation

## **6. Additional sources of information**

Manifests are now posted in the DOCUMENTS section of the website

An analytical summary is now posted in the DOCUMENTS section of the website

## **7. Situational Reference Materials**

No information available at this time.